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UBER TECHNOLOGIES, INC.  
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,  
22 Plaintiff,  
23 v.  
24 UBER TECHNOLOGIES, INC.,  
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL THEIR  
OPPOSITION TO WAYMO'S  
MOTION TO COMPEL UBER  
SOURCE CODE**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Opposition to Waymo’s Opposition to Waymo’s Motion To Compel Uber Source Code. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition to Waymo’s Motion to Compel (“Opposition”)	Highlighted Portions	Defendants (Blue) Plaintiff (Green)
Exhibits 1-4	Entire Documents	Plaintiff
Exhibit 6 A and 6B	Entire Documents	Defendants

The blue-highlighted portions of the Opposition and the entireties of Exhibits 6A and 6B contain highly confidential information regarding Ottomotto source code. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Defendants by acquiring details into the source code in Ottomotto’s software, such that Defendants’ competitive standing could be significantly harmed. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

The green-highlighted portions of the Opposition and the entireties of Exhibits 1-4 contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

1 Defendants served Waymo with this Administrative Motion to File Documents Under  
2 Seal on October 12, 2017.

3 For the foregoing reasons, Defendants request that the Court enter the accompanying  
4 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and  
5 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –  
6 ATTORNEYS' EYES ONLY."

7 Dated: October 12, 2017

MORRISON & FOERSTER LLP

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9 By: /s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ

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